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Attorneys for Joseph V. Womack, Trustee

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In re

**JOHN HENRY SCHNEIDER,**  
  
Debtor.

Case No. 14-61357

**MOTION FOR RULE 2004  
EXAMINATION OF  
WELLS FARGO BANK**

Pursuant to Rule 2004, F.R.B.P., Trustee Joseph V. Womack, as Chapter 7  
Trustee for the Bankruptcy Estate of John Henry Schneider, respectfully requests  
the Court to order an examination as follows:

1. **Witness to be examined:** Records Custodian of Wells Fargo Bank  
175 N. 27th Street  
Billings, Montana 59101
2. **Date:** Wednesday, March 18, 2015

3. **Time:** 11:00 a.m.

4. **Place:** Waller & Womack, P.C.  
Suite 805, U.S. Bank Building  
303 N. Broadway  
Billings, Montana

5. **Scope of examination:** To review financial records of John Schneider, Northern Rockies Neuro-Spine, P.C., Schneider Limited Partnership, Schneider Management, LLC, Michelle Schneider, the John Schneider Revocable Trust dated November 20, 2007, the Michelle Schneider Revocable Trust dated November 20, 2007, the Brandon Schneider Benefit Trust, dated March 30, 2012 (Kathleen Theresa Burrows, Trustee), the Shannon Schneider Benefit Trust, dated March 30, 2012 (Kathleen Theresa Burrows, Trustee), the Caitlin Schneider Benefit Trust, dated March 30, 2012 (Kathleen Theresa Burrows, Trustee), Medport, LLC, BSC, LLC and Northern Rockies Insurance Company.

6. **Documents to be produced:**

- a. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for all accounts in the name of John Schneider, or on which John Schneider had signing authority from January 1, 2009 to present;
- b. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for any accounts for accounts of Northern Rockies Neuro-Spine, P.C. from January 1, 2009 to present;

- c. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of Schneider Limited Partnership, from January 1, 2009 to present;
- d. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of Schneider Management, LLC, from January 1, 2009 to present;
- e. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for all accounts in the name of Michelle Schneider, or on which Michelle Schneider had signing authority from January 1, 2009 to present;
- f. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of the John Schneider Revocable Trust dated November 20, 2007, from January 1, 2009 to present;
- g. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of the Michelle Schneider Revocable Trust dated November 20, 2007, from January 1, 2009 to present;

- h. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of the Brandon Schneider Benefit Trust, dated March 30, 2012 (Kathleen Theresa Burrows, Trustee), from January 1, 2009 to present;
- i. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of the Shannon Schneider Benefit Trust, dated March 30, 2012 (Kathleen Theresa Burrows, Trustee), from January 1, 2009 to present;
- j. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of the Caitlin Schneider Benefit Trust, dated March 30, 2012 (Kathleen Theresa Burrows, Trustee), from January 1, 2009 to present;
- k. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of Medport, LLC, from January 1, 2009 to present;
- l. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of BSC, LLC, from January 1, 2009 to present;

- m. Copies of account statements, deposit slips, account formation documents, cancelled checks and any communications for accounts of Northern Rockies Insurance Company from January 1, 2009 to present;
- n. Copies of all documents and communications with John Schneider relating to any banking or lending relationship with John Schneider, or for which he was a signator or guarantor.

7. **Time, date and place of production (if different from examination):** n/a.

8. **Movant's calculation of mileage pursuant to F.R.B.P. 2004(e):** .42 miles round trip from 175 N. 27th Street, Billings Montana at \$0.575 is the amount of \$0.24.

9. The Trustee is seeking documents from a third-party financial institution. Thus, a subpoena *duces tecum* pursuant to F.R.B.P. 9016 is required.

DATED this 4th day of March, 2015.

GOETZ, BALDWIN & GEDDES, P.C.

By: /s/Trent M. Gardner

Trent M. Gardner/Jeffrey J. Tierney  
Attorneys for Trustee Joseph V. Womack

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies under penalty of perjury that on March 4, 2015, a copy of the foregoing pleading was served (i) by electronic means pursuant to LBR 9013-1(d)(2) on the parties noted in the Court's ECF transmission facilities and/or (ii) by mail on the following parties: None.

*/s/Trent M. Gardner*

Trent M. Gardner  
Attorneys for Trustee Joseph V.  
Womack